

REPORT ON INSPECTION TO DETERMINE
COMPLIANCE WITH THE EMERGENCY
PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT OF 1986
(EPCRA), 42 USC 11001

GENEVA RUBBER COMPANY, INC.
5449 BISHOP ROAD
GENEVA, OHIO 44041

MARCH 23, 1989

Performed by

U.S. ENVIRONMENTAL PROTECTION AGENCY
PESTICIDES & TOXIC SUBSTANCES BRANCH
230 SOUTH DEARBORN STREET
CHICAGO, ILLINOIS 60604

COMPANY INSPECTION

I. COMPANY IDENTIFICATION

Geneva Rubber Company, Inc.
5449 Bishop Road
Geneva Ohio 44041
(216) 466-4666

RESPONSIBLE OFFICIAL

Mr. Donald P. Reiter, President

II. DATE OF INSPECTION

March 23, 1989

III. PARTICIPANTS

GENEVA RUBBER COMPANY, INC:

Mr. Barry Drought, Technical Manager

U.S. EPA, REGION V

Mr. Jack C. Rubin, Technical Assistant, 5SPT-7. CCS (Author)

IV. OBJECTIVES

The inspection was conducted to document the facility's reporting practices and to determine its compliance with the EPCRA Regulations, 42 USC 11001.

V. COMPANY BACKGROUND

This company is engaged in the manufacturing of mechanical rubber molded goods. The facility consists of one building with 72,000 square feet under one roof. There are 145 employees and the SIC number is 3069. Gross sales in 1987 were 8.2 million dollars. The basis for inspection was the neutral inspection scheme. The company has an EPA RCRA I.D. Number OH0004176582 and NPDES Permit No. OH 0087831. In 1987 the company used 33,796 pounds of methylene chloride and 14,450 pounds of toluene.

VI. SUMMARY OF INSPECTION

A. OPENING CONFERENCE

The U.S. EPA inspector met with the facility representatives, presented his credentials to Mr. Barry Drought, Technical Manager, and explained the purpose and trade secrets policy of the inspection. The Notice of Inspection and the Receipt for Samples and Documents covered by the Emergency Planning and Community Right-to-Know Act (Attachments A and B) were presented. Copies of toxic chemicals used by this facility were also obtained for our records (Attachment C).

B. STORAGE

During the walk-through inspection of the facility, in the areas inspected the inspector found an above ground storage tank of liquid nitrogen and an underground tank for fuel oil. Methylene chloride was stored in two 250 gallon tanks. There were two 55-gallon drums of phosphoric acid. In the storage part of the facility there were pellets of rubber material for the molding operation, and zinc oxide compound material. In the manufacturing area, there were a zinc oxide dip tank, heat/pressure presses, 300-ton presses for ejection molding, and a phosphate conversion process tank. The adhesive room was used to adhere metal to rubber.

C. DISPOSAL

Disposal of methylene chloride is handled by "Liberty Solvents and Chemicals" and waste liquid mixture of zinc phosphate and alkaline degreasing solution (non-hazardous) by "Envirite Corp."

D. RECORDKEEPING

Purchasing records collected reflect only chemicals that may have reached threshold values and the MSDS that correspond to these chemicals. Copies of the Uniform Hazardous Waste Manifest was also obtained. The facility was in the process of filling out forms to comply with Sections 304,311 and 312 of SARA Title III.

E. DRAIN AND WASTE STREAMS

The POTW is not used for waste.

F. SPILLS

There were no spills reported in 1987.

G. CLOSING CONFERENCE

At the closing conference a receipt for the documents was presented to the facility representative. The facility representative was advised that based on the purchasing 1987 summary sheet presented that the company met the threshold amounts for two 313 chemicals, namely, methylene chloride and toluene, and would have to fill out the "R" Form for 1987.

VII. ATTACHMENTS

- A. Notice of Inspection
- B. Receipt for samples and Documents
- C. List of chemicals generally stored in the warehouse
- B. Telephone log record when contact was made with Mr. Donald P. Reiter, President

TITLE III SECTION 313 INSPECTION

COMPANY: Geneva Rubber Company, Inc.
5449 Bishop Road
Geneva, Ohio 440041

DATE OF INSPECTION: March 23, 1989

FINDINGS AND CONCLUSIONS:

It appears that the facility is not in compliance with the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), 42 USC 11001. The inspector found that the facility did meet threshold amounts on two 313 chemicals, namely, methylene chloride and toluene, and was not in compliance. The inspector did receive the "R" Form several weeks later in the mail for the two chemicals dated April 10, 1989.

The two chemicals were:

Methylene Chloride	33,766 lbs.
Toluene	14,450 lbs.

INSPECTOR: Mr. Jack C. Rubin. Technical Assistant, 5SPT-7, CCS, (Author)

John 5/16/89

Approved by:

Date:

Abeer Hashem

Abeer Hashem, Chief
Chemical Control Section

5/19/89


 US ENVIRONMENTAL PROTECTION AGENCY
 WASHINGTON, DC 20460

Emergency Planning, and Community Right-to-Know

Act of 1986 (SARA Title III)

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE 3/23/89	INSPECTOR NO. AV007	DAILY SEQ. NO. 2	11:00 A	GENEVA RUBBER CO., INC
4. INSPECTOR ADDRESS 230 S. DEARBORN ST. CHICAGO, IL. 60604			5. FIRM ADDRESS 5449 BISHOP RD. GENEVA, OH 44041	

REASON FOR INSPECTION

This inspection is for the purpose of determining compliance with The Emergency Planning and Community Right-to-Know Act of 1986, Section 313 toxic chemical release reporting requirements. The scope of this inspection may include but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; review of manufacturing, importing, processing, use, and/or waste treatment facilities; taking samples and photographs; and other inspection activities necessary to determine compliance with the Act.

INSPECTOR SIGNATURE <i>Jack C. Rubin</i>		RECIPIENT SIGNATURE <i>Barry Drought</i>	
NAME JACK C. RUBIN		NAME BARRY DROUGHT	
TITLE TECHNICAL ASSISTANT	DATE SIGNED 3/23/89	TITLE TECH MGR	DATE SIGNED 3/23/89

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460Emergency Planning, and Community Right-to-Know
Act of 1986 (SARA Title III)
RECEIPT FOR SAMPLES AND DOCUMENTS

Page of

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 3/23/89	INSPECTOR NO. AV007	DAILY SEQ. NO. 2	GENEVA RUBBER Co., INC.
3. INSPECTOR ADDRESS 230 S. DEARBORN ST. CHICAGO, IL 60604			4. FIRM ADDRESS 5449 BISHOP RD. GENEVA, OH 44041

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Emergency Planning and Community Right-to-Know Act of 1986

RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
1	Purchasing records for 1987
1	Waste Manifest L. Percy Solvents & Chemicals
1	Waste Manifest Enviroline corp.
2 pgs.	MSDS - Oakite Dynadent
2 pgs.	MSDS - Oakite-Crycoat OC

Chemical identities for underlined items have been claimed as trade secret. The facility official requesting such treatment has read and understands EPCRA Section 322 and pertinent trade secret regulations and understands EPCRA Section 325 which provides for (among other things) penalties for frivolous claims.

INSPECTOR SIGNATURE <i>Jack C. Rubin</i>		RECIPIENT SIGNATURE <i>Barry Drought</i>	
NAME JACK C. RUBIN		NAME BARRY DROUGHT	
TITLE TECHNICAL ASSISTANT	DATE SIGNED 3/23/89	TITLE Tech MGR	DATE SIGNED 3/23/89

RECAP

GEORGE DUBOIS CO

1988

Page 1 of 1

NAME / CAS #
MANUFACTURE, PROCESS
OTHER WISE USE

1987

REPORT
FOR (CONTINUED)

METHYLENE CHLORIDE

TOTAL 33796 LBS

CAS # 75-09-2

MANUFACTURED, PROCESS

OTHER WISE USED

27720 LBS

LESS THAN 75 LBS NO

6076 LBS

LESS THAN 10 LBS NO

TOLUENE

14,450 LBS

CAS 108-88-3

MANUFACTURED, PROCESS

OTHER WISE USED

9665 LBS

LESS THAN 75 LBS NO

4785 LBS

LESS THAN 10 LBS NO

ZINC OXIDE

Particulate

CAS # 1314-13-2

27554 LBS

< 75 LBS NO

ZINC STARCH CAS # 557-85-1

600 LBS

TOTAL LBS REPORTED
1,746,623 LBS

TOTAL LBS
2,276,858 (WASH)
ASSUMED 2.5% EXPOSURE
= 56,921 LBS

ETU

Particulate

563 LBS

< 75 LBS NO

CAS # 96-45-7

SODIUM HYDROXIDE

CAS # 1310-73-2

ALL OTHER WISE USED

3014 LBS < 100 LBS NO

ALUMINUM OXIDE

CAS # 1344-29-1

8000 LBS < 100 LBS NO

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <div style="text-align: right;">B Geneva Rubber Company P.O. Box 270</div>		0 H D 0 0 4 1 7 6 5 8 2		0 0 0 1 8		A. State Manifest Document Number
4. Generator's Phone (216) 466-4666 Geneva, OH 44041						B. State Generator's ID
5. Transporter 1 Company Name Envirite Corp.		6. US EPA ID Number 0 H D 9 8 0 5 6 8 9 9 2		C. State Transporter's ID 52234 HW		D. Transporter's Phone
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone
9. Designated Facility Name and Site Address Envirite Corp. 2050 Central Ave., S.E. Canton, OH 44707		10. US EPA ID Number 0 H D 9 8 0 5 6 8 9 9 2		G. State Facility's ID		H. Facility's Phone (216) 456-1238
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers	13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
a. <input type="checkbox"/> HM Waste Liquid Mixture of Zinc Phosphate and Alkaline Degreasing Solution (Non-Hazardous)			0 0 1 T T	007.43	G	—
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information						
<p>16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.</p> <p>Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.</p>						
Printed/Typed Name Barry Drought			Signature <i>Barry Drought</i>		Month Day Year 1 4 87	
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature <i>Pandy Gehring</i>		Month Day Year 1 2 2 87	
Printed/Typed Name Pandy Gehring			Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials			Signature		Month Day Year	
Printed/Typed Name			Signature		Month Day Year	
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name			Signature		Month Day Year	

GENERATOR

TRANSPORTER

FACILITY

GENERATOR'S COPY

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.
OHD 004176582

Manifest Document No.
00017

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address:

Geneva Rubber Co.
P.O. Box 270
Geneva, OH 44041

A. State Manifest Document Number

B. State Generator's ID

4. Generator's Phone (216) 466-4666

5. Transporter 1 Company Name
Liberty Solvents & Chemicals

6. US EPA ID Number
OHD-052-324-548

C. State Transporter's ID PUGO-376-HW

D. Transporter's Phone 216-425-4484

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

Liberty Solvents & Chemicals
9429 Ravenna Road
Twinsburg, OH 44087

10. US EPA ID Number

OHD-052-324-548

G. State Facility's ID

H. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

13. Total Quantity

14. Unit Wt/Vol

1. Waste No.

HM

No.

Type

Quantity

Wt/Vol

Waste No.

a. X RQ, Waste Dichloromethane, ORM-A, UN1593 (F-001)

001

DM

00490

G

F001

b. X RQ, Waste Compound Cleaning Liquid, Flammable, NA1993, (F-001, F-003, F-005, D-001)

003

DM

01370

G

F001, F003, F005, D001

c.

d.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

Reclaim & issue Credit

THE GENEVA RUBBER CO.

S01

15. Special Handling Instructions and Additional Information

Send Manifest to Barry Drought

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name

Barry Drought

Signature

Month Day Year

11/12/87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Roy J. Gault

Signature

Month Day Year

11/12/87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

11/12/87

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Wanda Hall

Signature

Wanda Hall

Month Day Year

11/12/87

ORIGINAL-RETURN TO GENERATOR

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE

Mixture: unknown. See Section II.

EFFECTS OF OVEREXPOSURE

Direct contact causes burns of eyes and skin. Inhalation of concentrated mist may cause irritation of mucous membranes.

EMERGENCY AND FIRST AID PROCEDURES

Immediately flush eyes of skin with plenty of water for at least 15 minutes; for eyes, get medical attention. Remove contaminated clothing and shoes and wash before reuse. For inhalation remove from exposure. In case of severe overexposure contact a physician.

SECTION VI - REACTIVITY DATA

STABILITY

UNSTABLE

CONDITIONS TO AVOID N/A

STABLE

X

INCOMPATIBILITY (Materials to avoid)

Alkaline materials, chlorine-releasing materials.

HAZARDOUS DECOMPOSITION PRODUCTS

Acidic fumes and fumes of oxides of nitrogen and oxides of phosphorus.

HAZARDOUS POLYMERIZATION

MAY OCCUR

CONDITIONS TO AVOID

N/A

WILL NOT OCCUR

X

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Flush area with plenty of water. Neutralize remaining traces by covering with soda ash or lime. Flush area again with water.

WASTE DISPOSAL METHOD

Neutralize with alkaline material, dilute and discharge in accordance with federal state and local regulations. If required, remove phosphates and heavy metals (Oakite Dispoz Aid 2 may be used). Allow precipitate to settle. Remove sludge and haul away by scavenger. Neutralize, dilute and discharge remaining solution.

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type) -

N/A

VENTILATION

LOCAL EXHAUST

Provide adequate ventilation at elevated temperatures for

SPECIAL

MECHANICAL (General)

removal of mist.

OTHER

PROTECTIVE GLOVES

Rubber or other acid-resistant material.

EYE PROTECTION

Safety goggles.

OTHER PROTECTIVE EQUIPMENT

Rubber apron and/or other suitable protective clothing; face shield as necessary. Recommend eye wash and safety shower near use area.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

Avoid contact with eyes, skin and clothing. Wash thoroughly after handling. Avoid breathing mist. Suitable for general indoor storage at moderate temperatures out

OTHER PRECAUTIONS

of direct sunlight and away from heat. Some crystallization may occur below 32°F. (restores on thawing) Before opening drum, loosen closure slowly to relieve any pressure build-up. Keep container closed when not in use.

